

## ANDERSON KILL P.C.

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## MEMO ENDORSED

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May 20, 2025

Hon. Edgardo Ramos  
 United States District Court  
 Southern District of New York  
 40 Foley Square, Courtroom 619  
 New York, New York 10007

Defendant Kobi Afek's request is granted. Defendant Kobi Afek is directed to file the motion to dismiss the amended complaint by May 23, 2025.

SO ORDERED.

  
 Edgardo Ramos, U.S.D.J.  
 Dated: May 21, 2025  
 New York, New York

Re: *Prairie Street Capital, Inc. v. Kobi Afek, et al.*  
 Case No. 1:25-cv-00086 (ER)  
Request for Adjournment to File Motion to Dismiss

Dear Judge Ramos:

We represent Defendant Kobi Afek ("Afek") in the above-referenced action. We write to respectfully request a brief extension of time from May 20, 2025 to May 23, 2025 to file Afek's Motion to Dismiss Plaintiff's Amended Complaint (the "Amended Complaint"). Plaintiff consents to this request.

This is Afek's first request for adjournment with respect to his time to respond to the *Amended Complaint*. We note that the current date (May 20, 2025) to respond to the Amended Complaint was set by the Briefing Schedule for Answers or Responses to Plaintiff's First Amended Complaint, which was so-ordered by Your Honor on April 2, 2025 (Doc. No. 73).

Afek requests this adjournment/extension because: i) his counsel has been (and is) on trial in another matter; and ii) he continues to coordinate his litigation strategy with the other similarly situated individual Defendants and Plaintiff also agreed to extend their time.

Finally, in consideration of the Court's directive that the "premotion conference is waived as to all defendants" (Doc. No. 81), we understand that Afek is not required to submit a pre-motion conference letter pursuant to Your Honor's Individual Practices rules. If we are mistaken, we will submit such letter.

Thank you for your consideration.

Respectfully Submitted,

/s/ Keith A. Lazere  
 Keith A. Lazere

**cc: Luke McGrath, Esq. (counsel for Plaintiff; [lmcgrath@dunnington.com](mailto:lmcgrath@dunnington.com))**